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March 24, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of March 16, 2021, ECF No. 6663, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's order of November 24, 2020, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

On March 1, 2021, counsel for Saudi Arabia circulated to the parties a set of proposed redactions for sealed filings leading up to the November 25, 2019 and January 3, 2020 orders.

On March 15, 2021, counsel for FBI provided FBI's proposed redactions for the set of filings leading up to the July 22, 2019 orders. Subsequently, counsel for Saudi Arabia indicated that Saudi Arabia had no objections to FBI's proposed redactions from the March 15 circulation.

On March 17, 2021, counsel for Dallah Avco indicated that Dallah Avco will not seek redactions to the filings in Saudi Arabia's March 1 circulation and will take no position on redactions proposed by any other party.

Also on March 17, 2021, counsel for Saudi Arabia prepared and circulated redacted versions of certain documents in FBI's March 15 circulation to counsel for (1) the Muslim World League ("MWL"), the International Islamic Relief Organization ("IIRO"), and witness Abdullah Al Turki; and (2) the King Fahad Mosque ("KFM") and witnesses Khalil Al Khalil and Osman Kaldirim. Those parties are currently reviewing the documents to propose redactions, if any, for their confidential information. Counsel for the MWL, the IIRO, and Al Turki have advised that they expect to complete review by March 29, 2021.

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Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before April 23, 2021.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)